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NETFLIX, INC.

6
7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9

10 NETFLIX, INC., a Delaware corporation,
11 Plaintiff,

12 v.

13 BLOCKBUSTER, INC., a Delaware
corporation, DOES 1-50,
14 Defendant.
15

Case No. C 06 2361 WHA

**DECLARATION OF NEIL D. HUNT IN
SUPPORT OF NETFLIX'S MOTION FOR
PROTECTIVE ORDER**

Date: December 8, 2006
Time: 9:30 a.m.
Judge: Hon. Joseph C. Spero
Room: Courtroom A, 15th Floor

16 AND RELATED COUNTERCLAIMS.
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1 I, NEIL D. HUNT, declare and state as follows:

2 1. I have personal knowledge of the facts set forth below, and if called to testify as a
3 witness thereto could do so competently under oath.

4 2. I presently serve as Netflix, Inc.'s ("Netflix") Chief Product Officer, a position that I
5 have held since 2004. I joined Netflix in January, 1999 as Vice President, Internet Engineering.
6 I am also a named inventor on both patents that Netflix has accused Blockbuster, Inc. of
7 infringing in this lawsuit.

8 3. I have personal knowledge of the methods that Netflix has contemplated using and
9 has used over time to allocate DVD items to customers. At no time on or before April 28, 2000
10 did Netflix design, develop or use any method to vary the speed or priority of fulfilling a
11 customer's rental request based, in whole or in part, on the number or frequency of items rented
12 by the customer.

13 I declare under penalty of perjury under the laws of the State of California that the
14 foregoing is true and correct. Executed on this 20th day of September, 2006, in Los Gatos,
15 California.

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20 NEIL D. HUNT
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